## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA RALEIGH DIVISION CASE NO. 5:18-cr-452

UNITED STATES OF AMERICA,	)	
Plaintiff,	)	
v.	)	
	)	ATTORNEY AFFIDAVIT
LEONID TEYF et al.,	)	
Defendants.	)	

JAMES P. MCLOUGHLIN, JR., pursuant to Rule 47.1 of the Local Criminal Rules for the U.S. District Court for the Easter District of North Carolina and under the penalties of perjury, affirms:

- 1. I am a member of Moore & Van Allen, PLLC.
- 2. I represent Defendant, Leonid Teyf in connection with the above-captioned case.
- 3. Mr. Teyf has resided in the Raleigh, North Carolina area since 2010. Mr. Teyf owns expensive and significant real estate in Wake County, North Carolina.
- 4. Mr. Teyf has three children who reside in the United States, two of whom are citizens of the United States, and a third who has applied for naturalization. One of his children is a minor attending school in Raleigh.
- 5. I am informed and believe Mr. Teyf has no relevant criminal history or any history of failures to appear with respect to any court proceeding.
- 6. Mr. Teyf has substantial ownership interests in multiple businesses, including trucking companies in the United States.
- 7. Mr. Teyf has been aware of the Department of Homeland Security's ("DHS") investigation into his business affairs since at least the spring of 2018.
- 8. Mr. Teyf had knowledge that Alexey Timofeev was arrested by DHS in April 2018 and that Mr. Timofeev cooperated with DHS.
- 9. Mr. Teyf understood that the Government's agents expressed interest in Mr. Teyf's own business activities and the sources and uses of his funds at that time.
- 10. Since becoming aware of the government inquiry into his business affairs, Mr. Teyf has travelled internationally and returned to the United States.

- 11. Mr. Teyf also doubled his ownership interests in certain trucking businesses in Utah after becoming aware of the government investigation.
- 12. Mr. Teyf has very significant financial assets that have been frozen by court order and could be subject to forfeiture if he did not appear.
- 13. I am informed and believe Mr. Teyf has Russian and Israeli citizenship and passports, which he is prepared to surrender as a condition of release.
- 14. Konstantin Tomilin, a family friend and former business partner of Mr. Teyf, has agreed to serve as a potential Third-Party Custodian for Mr. Teyf as a condition to his release. Mr. Teyf's son, Grigory Teyf, has also agreed to serve as a Third-Party Custodian for Mr. Teyf as a condition to his release.
- 15. Mr. Teyf is currently experiencing numerous medical issues including kidney stones, diabetes, heart issues, and bowel issues. Mr. Teyf has been under medical observation during his time in confinement.
- 16. Mr. Teyf is willing to consent to the imposition of any reasonably necessary condition to ensure his appearance at any future preceding and to ensure the safety of the community including agreeing to all conditions set forth in 18 U.S.C. § 3142 (c)(1).

This 14<sup>th</sup> day of December, 2018.

/s/ James P. McLoughlin, Jr.

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